# Purpose and Need



#### 1.1 INTRODUCTION

This Environmental Assessment (EA) has been prepared to analyze the Utah Bureau of Land Management's (BLM) proposal to amend 21 Land Use Plans (LUPs) to incorporate current planning requirements associated with fire management on public lands within the state of Utah. Fire management refers to the spectrum of activities including wildfire suppression, wildland fire use, prescribed fire, non-fire fuel treatments, and emergency stabilization and rehabilitation. This proposed planning amendment represents the Proposed Action for the EA. This EA is a broad analysis of potential impacts that could result from either the implementation of the Proposed Action or the continuation of current management strategies (No Action). This EA is intended to assist the BLM in updating existing LUPs to incorporate current fire management requirements; to ensure compliance with National Environmental Policy Act (NEPA) regulations; and to determine whether "significant," as defined by the President's Council on Environmental Quality (CEQ) in Regulation 40 CFR Part 1508.27, impacts could result from the analyzed actions.

An EA provides evidence for determining whether to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI) statement. A Decision Record (DR), which includes a FONSI statement, is a document that briefly presents the reasons why implementations of the Proposed Action would not result in significant environmental impacts (effects) beyond those already addressed within each LUP. If the decision maker determines that this project would have significant impacts as indicated by the analysis in this EA, then an EIS would be prepared for the project. If not, a DR may be signed for the EA approving the Alternative selected. The DR would identify the fire management planning goals and objectives associated with each LUP and would provide the language upon which future fire management planning and implementation actions could tier (as per 40 CFR Part 1502.20). Issues associated with decisions would be analyzed in the future within specific planning-level and implementation-level NEPA documents.

Issues identified for further analysis within this EA are included as **Appendix A: Interdisciplinary Team Analysis Record Checklist**. This appendix includes the resource concerns identified in the EA, including those resources considered Critical Elements of the Human Environment and related issues derived from the BLM, affiliated agency reviews, and comments received during scoping.

#### 1.2 BACKGROUND

In 2004, the BLM Utah State Office evaluated 21 of 25 existing LUPs within Utah and found that they have not kept pace with current fire management issues and policies set forth in the Federal Wildland Fire Management Policy (1995, 2001) and BLM Land Use Planning Handbook [(1995) as amended by Instruction Memorandum IM-WO-2004-007]. Ecosystem changes, the scale of rehabilitation and stabilization activities, and the scale of fuel treatments called for by the National Fire Plan and Healthy Forests Restoration Act of 2003 were unforeseen at the time the LUPs were written. The other four LUPs, which were not reviewed in 2004, covering the Vernal and Price BLM Field Offices are currently undergoing major revisions for all actions and will be updated to comply with current fire policy as part of those planning processes.

None of the LUPs adequately address direction contained within Federal Wildland Fire Management Policy (1995); Review and Update of the Federal Wildland Fire Management Policy (2001); or A Collaborative Approach for Reducing Wildland Fire Risks to Communities and the Environment: 10-Year Comprehensive Strategy (2001).

The proposed amendment encompasses fire management planning for approximately 19 million acres of public lands within Utah managed by the BLM (referred to as the planning area), as shown in **Table 1.1**. The boundaries of BLM field offices and LUP boundaries affected by the Proposed Action are shown on **Figure 1.1**. The boundaries of BLM support centers and field offices affected by the Proposed Action are shown on **Figure 1.2**. The proposed amendment would incorporate the necessary planning requirements to bring each of the selected LUPs administered by the identified field offices into conformance with current planning policy. The proposed amendment would replace all existing fire management language with direction that reflects current federal requirements for fire management.

Table 1.1 BLM Land Administration and Areas Proposed for Amendment

Lands	Acres (approx.)
Total Land and Water Area in Utah	54,247,283
Total Federal Lands in Utah	34,860,878
BLM-administered Surface Lands in Utah	22,931,060
BLM-managed Lands in Utah proposed for Fire Management	18,830,276
Amendment	

The BLM field offices in Salt Lake City, Richfield, Fillmore, Moab, Monticello, Kanab, Cedar City and St. George, and the Grand Staircase-Escalante National Monument (GSENM), administer the LUPs identified for amendment. Of these 21 LUPs, the Box Elder Resource Management Plan (RMP), Pony Express RMP, House Range RMP and Warm Springs RMP will be included in this assessment for analysis purposes. Prior to any amendment to these four LUPs, BLM would require that the planning restriction imposed by Section 2815 of the National Defense Authorization Act of Fiscal Year 2000 be resolved and the plan amendment process be completed in accordance with Regulation 43 CFR Part 1600. This EA will serve as the NEPA analysis document of record for BLM's determinations with respect to amending these four LUPs in the future. For purposes of analysis, references in this EA to the proposed amendment of 21 LUPs include these four LUPs. **Table 1.2** lists the 21 LUPs to be amended by the Proposed Action, 14 of which have existing fire management direction.

Figure 1.1 Boundaries of BLM Field Offices and LUP Boundaries Affected by the Proposed Action

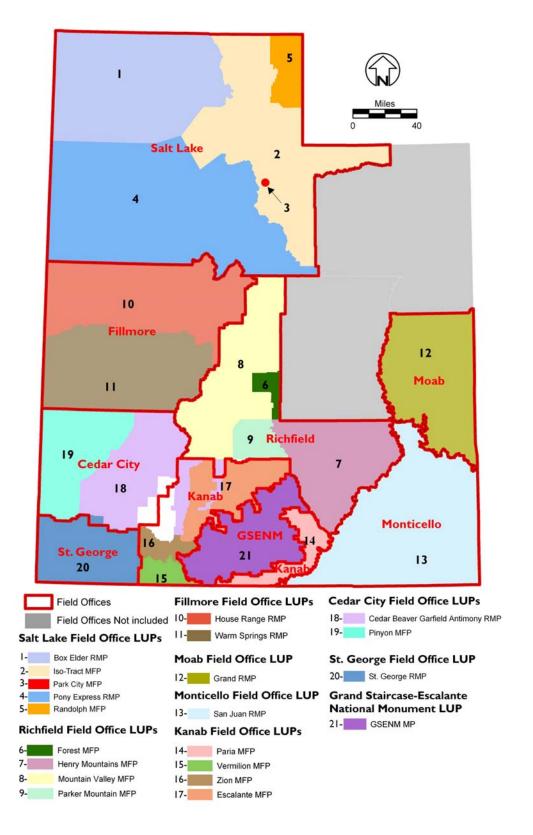


Table 1.2 LUPs to be Amended by the Proposed Action

Land Use Plan	Year Last Updated	Existing Fire Management Direction	
Salt Lake Field Office			
Box Elder RMP*†	1986	Yes	
Iso-Tract Management Framework Plan (MFP)†	1985	Yes	
Park City MFP <sup>†</sup>	1975	Yes	
Pony Express RMP*†	1990	Yes	
Randolph MFP <sup>†</sup>	1980	Yes	
Richfield Field Office			
Forest MFP	1977		
Henry Mountain MFP	1982	Yes	
Mountain Valley MFP	1982		
Parker Mountain MFP	1982		
Fillmore Field Office			
House Range RMP*	1987	Yes	
Warm Springs RMP*	1987	Yes	
Moab Field Office			
Grand RMP	1985	Yes	
Monticello Field Office			
San Juan RMP	1991	Yes	
Kanab Field Office			
Escalante MFP	1981		
Paria MFP	1981		
Vermilion MFP	1981		
Zion MFP	1981		
Cedar City Field Office			
Cedar Beaver Garfield Antimony RMP	1986	Yes	
Pinyon MFP	1983	Yes	
St. George Field Office			
St. George RMP	1999	Yes	
Grand Staircase-Escalante National Monument (GSENM)			
GSENM Monument Management Plan (MP)	1999	Yes	

<sup>\*</sup> These four LUPs are included for analysis purposes and may be amended later. See Section 1.2 Background. † The Salt Lake District BLM Proposed Fire Management Plan Amendment UT-020-98-08 of July 1998 amended fire policy within these LUPs.

The BLM fire management program is organized within the state through five support centers. These centers include:

- Salt Lake Support Center (encompasses the Salt Lake Field Office)
- Richfield Support Center (encompasses the Richfield and Fillmore Field Offices)
- Moab Support Center (encompasses the Moab, Price and Monticello Field Offices)
- Southern Utah Support Center (encompasses the Kanab, Cedar City and St. George Field Offices and Grand Staircase-Escalante National Monument)
- Vernal Support Center (encompasses the Vernal Field Office)

The Salt Lake, Richfield, Moab and Southern Utah Support Centers are currently developing Fire Management Plans (FMPs) that would be based upon the goals and objectives developed for this planning amendment. These FMPs will provide for more specific area planning and implementation considerations. Since the Price Field Office in the Moab Support Center and the Vernal Field Office within the Vernal Support Center are currently developing fire management direction as part of their Resource Management Plan (RMP) revision processes, planning considerations for these two planning areas have not been included as part of this amendment.

#### 1.3 NEED FOR PROPOSED ACTION

The BLM Utah State Office needs to amend eight RMPs, twelve Management Framework Plans (MFPs) and one Monument Management Plan (MMP) to bring these LUPs into conformance and meet the directives developed as part of IM-WO-2004-007. National fire management policy has evolved in response to the increased fatalities, property loss, local economic disruptions and risk to ecosystems associated with increasingly severe wildland fire seasons and increasing Wildland Urban Interface (WUI) conflicts. Federal agencies must change their fire management practices to increase protection of human life and decrease natural resource and private property damage as mandated by national policy. Current scientific understanding of the benefits of fire to natural ecological processes needs to be incorporated into the management of fire. Successful implementation of a fire management amendment would result in clear fire management direction that is compliant with national and interagency direction.

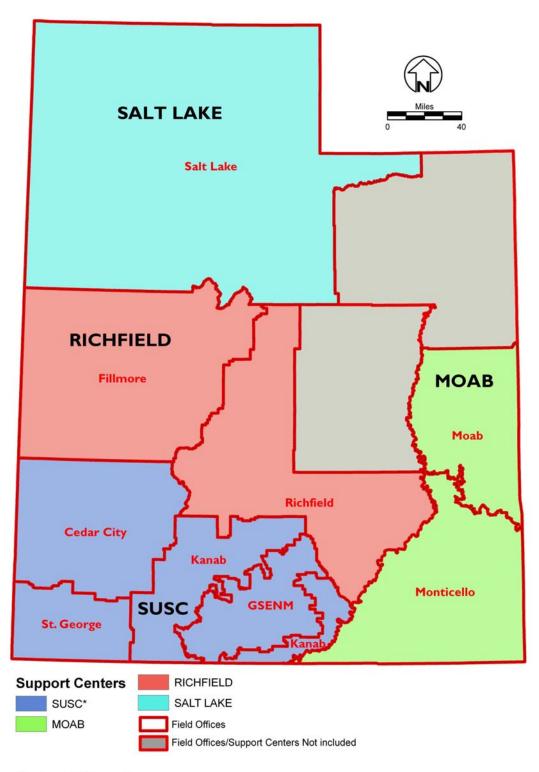
#### 1.4 PURPOSE OF THE PROPOSED ACTION

The current LUPs do not meet BLM's goal to incorporate consistently BLM fire management direction. The purpose of this proposed amendment is to accomplish the required updates by incorporating fire management direction into existing LUPs. The fire management amendment, in consideration of other federal, state, local and Tribal land management plans, would provide a consistent approach to incorporating policy associated with the National Fire Plan into LUPs. The updates would minimize conflicts with other existing LUP decisions and provide the necessary tools to public land managers across the state to meet other resource objectives described in the existing LUPs.

In order to fulfill this purpose, the following objectives shall be met:

- Establish landscape level fire management goals and objectives.
- Describe Desired Wildland Fire Conditions (DWFC) using Fire Regime Condition Class (FRCC), and the suite of management strategies and actions to meet DWFC and land use allocations.
- Describe areas where fire may be restored to the ecosystem through wildland fire use for resource benefit and areas where wildland fire use is not appropriate.
- Identify Resource Protection Measures (RPMs) for fire management practices (wildland fire suppression, wildland fire use for resource benefit, prescribed fire treatments, non-fire fuel treatments and emergency stabilization and rehabilitation actions) to protect natural or cultural resource values.

Figure 1.2 Boundaries of BLM Support Centers & Field Offices Affected by the Proposed Action



<sup>\*</sup> Southern Utah Support Center

- Identify criteria used for establishing fire management priorities.
- Identify maximum burned areas and treatment acres (for the 15-year life of plan) for wildland fire, wildland fire use for resource benefit, prescribed fire treatments, non-fire fuel treatments and emergency stabilization and rehabilitation actions.

# Fire Regime Condition Class

**FRCC:** a description of vegetation conditions based on the change from natural fire regime; includes effects of fire suppression (fuel loading and encroachment) and invasive species invasion

FRCC 1: within historical range for fire return interval and vegetation attributes

FRCC 2: moderately altered from historical range

FRCC 3: substantially altered from historical range and vegetation attributes

The following underlying goals drive the objectives:

- Protection of human life would be the prime suppression priority. Setting priorities among protecting human communities and community infrastructure, other property and improvements and natural and cultural resources would be done based on the values to be protected, human health and safety and costs.
- The full range of fire management actions would be used to achieve ecosystem sustainability.
- Hazardous fuels would be reduced.
- Ecosystems would be restored.
- Communities at risk would be protected.

# 1.5 CONFORMANCE WITH BLM LAND USE PLANS

The 21 LUPs proposed for amendment were reviewed for potential conflicts among resource goals and fire management direction in the Proposed Action and none were found. Fourteen of the twenty-one LUPs have existing fire management direction that would be replaced by the Proposed Action, if selected. The current fire management direction in these 14 plans can be found in **Appendix B**.

The remaining seven LUPs either do not have goals, objectives, and direction specifically related to fire management, or they describe fire within the context of other resource management needs. The discussion of fire as a management action for other resource management needs is focused on prioritization of fire as a tool to manage vegetation for rangeland management (Randolph MFP, Paria MFP, Vermilion MFP); consolidated lands treatment (Paria MFP); preservation of wildlife values and habitat (Paria MFP, Escalante MFP); and, soil loss and watershed health (Paria MFP, Vermilion MFP).

As stated in Section 1.4, the LUPs would be amended to address current fire management direction and developed to minimize conflicts with other LUP decisions, resource goals, and objectives. This amendment is consistent with goals, objectives, and decisions for other resources within the 21 LUPs affected. The proposed fire

management direction would provide necessary tools to public land use managers across the state to meet other resource objectives described in the existing LUPs.

# 1.6 RELATIONSHIP TO STATUTES, REGULATIONS OR OTHER PLANS

The CEQ regulations for implementing NEPA (Title 40 CFR Parts 1500-1508) detail the process of preparing NEPA documents. This CEQ guidance and BLM's internal guidance for conducting an EA-level analysis, Utah BLM NEPA Guidebook (April 2004), were followed in the preparation of this document. BLM's NEPA Handbook (H-1790-1) contains further BLM guidance for preparation of an EA-level analysis.

The BLM planning process is governed by the Federal Land Policy and Management Act of 1976 (FLPMA 43 USC 1711) and the Code of Federal Regulations contained in 43 CFR Part 1600. The BLM Land Use Planning Handbook (H-1601-1, as amended) contains guidance and outlines the BLM's LUP amendment process. Appendix C of the Land Use Planning Handbook contains specific guidance on resource management to be incorporated into a LUP. IM-WO-2004-007 provides language to revise this portion of the Land Use Planning Handbook with regard to fire management guidance. The Proposed Action addresses the requirements of fire management planning as described in IM-WO-2004-007; complies with the intent and requirements of FLPMA; and has been developed in consideration of multiple resource goals and objectives.

In addition to meeting the goals, objectives and management actions of IM-WO-2004-007, other applicable fire management planning goals, policy statements and specific fire management decisions considered and addressed by the Proposed Action include:

- Federal Wildland Fire Management Policy (1995)
- Review and Update of the Federal Wildland Fire Management Policy (2001)
- A Collaborative Approach for Reducing Wildland Fire Risks to Communities and the Environment: Ten-Year Comprehensive Strategy (2001)

The Federal Wildland Fire Management Policy and the Review and Update of the Federal Wildland Fire Management Policy mandate that firefighter and public safety is the first priority in any fire management action. For suppression activities, the protection of human life is the most important priority. Setting priorities among protecting human communities and community infrastructure, other property and improvements and natural and cultural resources would be done based on the values to be protected, human health and safety and the costs of protection. A Collaborative Approach for Reducing Wildland Fire Risks to Communities and the Environment: 10-Year Comprehensive Strategy identifies the reduction of hazardous fuels and the restoration of ecosystems as goals to be considered when amending the LUPs. In addition to these requirements, a full range of fire management activities must be used to achieve ecosystem sustainability.

Several past EISs, present BLM plans, and NEPA documents identify hazardous fuels reduction treatment objectives and analyze impacts of vegetation treatments. One document that influences identification of hazardous fuel treatments acreage goals and analyze impacts is the Final EIS Vegetation Treatment on BLM lands in Thirteen Western States (1991). The vegetation EIS, focused analysis in the following areas:

• How each vegetation treatment method affects vegetation on a regional basis

- How each method affects fish and wildlife and their habitats
- How mechanical treatments and prescribed burning affect soils
- How all natural resources may be affected positively as well as negatively
- How herbicides and prescribed burning affect human health and safety

In consideration of these planning and fire management specific requirements, the Proposed Action considers and has been developed in compliance with other applicable environmental laws, policies and Executive Orders. These authorities include (but are not limited to) the Healthy Forests Restoration Act; the Clean Air and Clean Water Acts; the Wild and Scenic Rivers Act; the Endangered Species Act; the National Historic Preservation Act; the Archaeological Resource Protection Act; and the Colorado River Basin Salinity Control Act.

The Proposed Action is in compliance with Utah's laws for air pollution and it is consistent with Utah Rangeland Health Standards and Guidelines as well as the Native American Trust Resource Policies. Planning and resource management considerations incorporated into the development of the Proposed Action include those associated with Planning Land Orders for a variety of lands and realty actions within the state and with a variety of Executive Orders (EOs). These EOs include EO 11514 (Protection and Enhancement of Environmental Quality); EO 11593 (Protection and Enhancement of the Cultural Environment); EO 11988 (Management of Floodplains); EO 11990 (Management of Wetlands and Riparian Areas); EO 12866 (Regulatory Planning and Review); EO 12898 (Consideration of Environmental Justice Issues); EO 13112 (Management of Invasive Species); and EO 13186 (Management of Migratory Birds). Specific land management and wildland fire management policy are shown in **Appendix C**.

The Proposed Action would be consistent with adjacent federal land agency, state of Utah and affiliated Native American Tribal planning. The BLM would make adjustments to fire and/or fuel treatments during implementation planning. These adjustments would reduce the risk to resources on lands adjacent to BLM lands. For wildland fire use, fire management would be as consistent as possible with the fire management strategies employed on adjacent lands (as administered by other federal, state and Native American Tribal authorities). The role of fire to protect resources on adjacent non-BLM-administered lands is considered in the Proposed Action as criteria for making wildland fire use decisions. Resources managed by other federal, state and Tribal agencies were also taken into consideration during the development of Resource Protection Measures within the Proposed Action.

The Proposed Action has been developed in consideration of statewide local government planning concerns. No inconsistencies with those concerns were identified during public scoping.

# 1.7 IDENTIFICATION OF ISSUES

In consideration of the previously discussed regulatory conformance and compliance requirements, the BLM distributed a draft Purpose and Need statement and an outline of the decisions to be made in the Proposed Action. These draft materials were provided for discussion during public scoping and comment in July 2004. The comments that were received from the public during the scoping period were considered by the

BLM as the Proposed Action was being developed and as other action alternatives were discussed. As a result of those considerations, the BLM has developed this EA to disclose the impact of one action alternative (the Proposed Action) and the No Action Alternative (continuation of current management). The analysis and findings described in this EA will help the BLM State Office decide:

- Whether to continue with current fire management direction in the LUPs or change the management direction
- What management direction is necessary and where should the direction be applied to address the Purpose and Need

As part of the process to determine the project's scope, agency coordination and notification, BLM took actions to inform and obtain input from federal, state, Tribal and local agencies about this LUP amendment, the schedule and the steps being taken to complete the project. The agencies were given the opportunity to participate and comment, as detailed below in Section 5.2.

**Appendix A** includes the resource management concerns identified (including those resources considered as Critical Elements of the Human Environment) and related issues derived from the BLM, affiliated agency reviews and comments received during scoping. These issues helped shape the management strategies associated with the Proposed Action. Issues related to fire and fuels management make up the Proposed Action and are discussed throughout the EA. Resource issues form the basis of analysis within this document.

The proposed amendment would not be in conflict with other existing resource goals and objectives in the LUPs. However, issues have been identified for this EA that are based on conflict with resource management actions identified within the existing LUPs. The issues identified have been organized using guidance from Appendices C and D of the Land Use Plan Handbook. Appendix C provides guidance for discussion of resources associated with natural, biological and cultural resources; resource uses; and special designations, while Appendix D provides guidance for discussion of social science considerations and the effect of resource management on the public.

# 1.7.1 Issues Identified for Analysis Pertaining to Natural, Cultural, and Biological Resources

# Air

- Impacts on Class I visibility
- Impacts on human health from particulate matter

# Soil and Water (including Floodplains and Wetland/Riparian Zones)

- Impacts on soils, including nutrient cycling, infiltration/runoff (compaction) and erosion/sedimentation
- Impacts on water quality and beneficial use
- Impacts on floodplain resources from suppression activities
- Impacts on floodplain resources from fuel treatments and wildland fire
- Impacts on wetland/riparian zones

# Vegetation (including Invasive and Non-Native Species Management)

- Impacts on vegetation condition goals and objectives
- Impacts on vegetation communities from noxious weed encroachment

# **Special Status Species**

- Direct and indirect impacts on listed/candidate species and their habitats and designated critical habitats
- Impacts on special status plant species management goals and objectives

#### Fish and Wildlife

 Loss or modification of crucial habitats and/or disturbance or displacement of fish and wildlife species as a result of habitat alterations

# Cultural Resources (including Native American Religious Concerns)

- Impacts on sites of cultural and archaeological value
- Impacts on traditional use of vegetation and cultural or religious sites

#### Visual Resources

Impacts on visual resources

# Naturalness, Solitude, and Primitive Recreation

 Surface-disturbing impacts from fire management activities (including rehabilitation actions) on the natural character of the landscape, on outstanding opportunity for solitude and primitive/unconfined recreation and to any supplemental values

# 1.7.2 Issues Identified for Analysis Pertaining to Resource Uses

# Forestry

• Impacts on biomass availability (including firewood collection) and healthy forest conditions (including old growth)

#### Livestock Grazing

Impacts on allotment use

# **Recreation and Visitor Services**

Impacts on developed recreation sites and facilities

# 1.7.3 Issues Identified for Analysis Pertaining to Special Designations

Congressional and Administrative Designations (including Areas of Critical Environmental Concern (ACECs); wilderness and Wilderness Study Areas (WSAs); and lands suitable for inclusion in the National Wild and Scenic River (WSR) system)

- Impacts on the relevant and important resource value at issue per ACEC
- Direct and indirect impacts on wilderness and suitability of WSAs
- Impacts on naturalness resulting from infestation of noxious weeds and other plants after suppression activities
- Impacts on outstanding remarkable values, tentative classification and freeflowing nature of WSR eligible segments

#### 1.7.4 Issues Identified for Analysis Pertaining to Social Science Considerations

#### Socioeconomics (including WUIs associated with BLM lands and adjacent ownerships)

Impacts on socioeconomics

#### 1.8 SUMMARY

This chapter presented the Purpose and Need of the proposed LUP Amendment, as well as relevant issues associated with resources that may be affected by the proposed fire management amendment. This EA will contain a planning-level discussion and analysis of potential conflicts with other resource management actions, rather than conflicts with other resource goals and objectives. Site-specific analysis of resources within LUP areas that would tier off the decision associated with this planning effort would be analyzed within future fire management planning and implementation actions. There are four Fire Management Plan EAs for the Salt Lake, Richfield, Moab and Southern Utah Support Centers under development that will be based upon the proposed amendment as described within this EA.

In order to meet the Purpose and Need of the proposed fire management amendment in a way that resolves the raised issues, the BLM has developed a single action alternative, the Proposed Action. This alternative, as well as the No Action Alternative, is presented in Chapter 2. The potential environmental impacts or consequences resulting from the implementation of each alternative are then analyzed in Chapter 4 for each of the identified issues.